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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

Master File No. 5:22-cv-07557-PCP (VKD)

This document relates to:

**STIPULATION AND [PROPOSED]
ORDER TO MODIFY CLASS
CERTIFICATION BRIEFING
DEADLINES**

All actions

[L.R. 6-2]

WHEREAS, on July 13, 2023, the Court set deadlines for Plaintiffs' motion for class certification and associated expert reports and related briefing, ECF No. 102, and on July 2, 2024, the Court revised deadlines for Plaintiffs' motion for class certification and associated expert reports and related briefing as requested by the parties in their December 28, 2023 Joint Case Management Statement. ECF Nos. 130, 148.

WHEREAS, both parties agree that further time for discovery is required before briefing begins on class certification. The parties have worked through numerous potential discovery disputes related to the scope of written discovery requests, search terms, and ESI sources, and have been able to resolve issues without court intervention. In light of the time necessary to resolve such issues to date, the parties agree that both sides require more time to complete document productions, depositions, and expert analysis necessary for class certification briefing.

WHEREAS, the parties have conferred and agreed to the following proposed modified briefing schedule, subject to Court approval.

WHEREAS, there have been no other requests to alter the class certification briefing schedule, and the Court has not set any deadlines other than for class certification briefing, so granting this request will have no other effect on the schedule for the case.

Accordingly, IT IS HEREBY STIPULATED AND AGREED between the parties, subject to the Court's approval, that the new class certification briefing schedule is as follows:

Event	Current Deadline	[Proposed] New Deadline
Plaintiffs' Motion for Class Certification and Associated Expert Report(s) Due	October 14, 2024	July 21, 2025
Meta's Class Certification Opposition and Associated Expert Report(s) Due	December 20, 2024	September 29, 2025
Plaintiffs' Class Certification Reply and Reply Expert Report(s) Due	February 14, 2025	November 17, 2025

1 Dated: September 6, 2024

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2 By: /s/ Neal Deckant
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Dated: September 6, 2024

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CIVIL L.R. 5-1(i)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: September 6, 2024

By: /s/ Neal J. Deckant
Neal J. Deckant

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. P. Casey Pitts
U.S. District Judge